

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
(Eastern Division)

In re

SANDRINE'S LIMITED LIABILITY  
COMPANY,

Debtor.

Chapter 11  
Case No. 14-15702-WCH

**LIMITED OPPOSITION BY CAMBRIDGE TRUST COMPANY TO ENTRY OF  
FINAL ORDER APPROVING DIP FINANCING AND USE OF CASH COLLATERAL**

Cambridge Trust Company ("Cambridge Trust") hereby opposes the Debtor's *Motion for Entry of Order: (I) Authorizing Debtor to Obtain Post Petition Financing; (II) Granting Liens, Security Interests and Super Priority Status; and Scheduling Final Hearing* (the "Motion"). Capitalized terms used herein that are not otherwise defined shall have the meaning given to them in the *Interim Order: (A) Authorizing Debtor to Obtain Postpetition Financing and Granting Security Interests Pursuant to 11 U.S.C. Section 364; (B) Authorizing Debtor's Use of Cash Collateral; and (C) Scheduling a Final Hearing and Establishing Related Notice Requirements* ("Interim Order").

Cambridge Trust has not yet received the Budget and has requested a budget to actual comparison in addition to certain expense information. Cambridge Trust has also requested copies of all reporting made by the Debtor to the Office of the United States Trustee. Debtor's counsel has been cooperative and has indicated that such information will be provided. Cambridge Trust objects to entry of a final order with respect to the DIP Motion to the extent that expenses have been unreasonable or the Budget for future periods is not

reasonable. Cambridge Trust also objects to entry of a final order that does not provide for reporting obligations or impairs the priority of liens possessed by Cambridge Trust Company.

Cambridge Trust files this as a protective objection and expects that it will reach agreement on a form of final order at or prior to the scheduled hearing.

CAMBRIDGE TRUST COMPANY,

By Its Attorneys,

Partridge Snow & Hahn LLP

/s/ Christopher J. Panos

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DATED: January 16, 2015

**CERTIFICATE OF SERVICE**

I hereby certify that on this 16th day of January, 2015, a copy of the foregoing document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF). Paper copies will be sent on January 16, 2015 by first class mail, postage prepaid, to those indicated as non-registered NEF participants.

/s/ Christopher J. Panos

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